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Attorney for Plaintiffs, LOWELL & SANDRA LABERTEW

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF CALIFORNIA

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| LOWELL LABERTEW, an individual; and SANDRA LABERTEW, an individual,<br><br>Plaintiffs,<br><br>vs.<br><br>3BC CORPORATION, a California Corporation; C&R FINANCIAL INC., an entity of unknown form; RAYMOND JACOB ROSZKOWICZ, an individual; RICK WILKES, an individual; BEVERLEE WILKES, an individual; and DOES 1-10, inclusive,<br><br>Defendants. | CASE NO. 07CV2092W (LSP)<br><br>**DECLARATION OF DEBORAH L. RAYMOND, ESQ. re TIME OUT OF JURISDICTION AND NOTICE OF PLAINTIFFS' APPLICATION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION TO DEFENDANTS** |

I, DEBORAH L. RAYMOND hereby declare:

1. I am an attorney duly admitted to practice law as a member of the State Bar of California and I am admitted to practices in the Southern District of California and all courts of the

State of California. I am a sole practitioner with offices located at 380 Stevens Avenue, Suite 205, Solana Beach, California 92075. The following declaration is based upon my personal knowledge such that if called as a witness, I could competently testify thereto.

3. I am the attorney of record for the above entitled case.

4. I will be out of the state of California (I will be in Washington, DC) from Wednesday, November 7, 2007 through Monday, November 12, 2007. I request that the Court not schedule any hearings during this time. If any hearing is required for Plaintiffs' Application for a Temporary Restraining Order, I request that it take place on Tuesday, November 13, 2007.

5. On Thursday, November 1, 2007, by telephone, I informed Beverlee Wilkes that if she would not postpone the Trustee's Sale of my clients' property scheduled for November 14, 2007, I would file an Application for a Temporary Restraining Order/Preliminary Injunction.

6. On Friday, November 2, 2007, I notified Beverlee Wilkes that I intended to file an Application For A Temporary Restaining Order and thereafter a Preliminary Injunction over the weekend or on Monday, November 5, 2007 at the latest.

7. On Sunday, November 4, 2007, I emailed the following documents to realtincup@gmail.com the only email address given to me by Mrs. Wilkes and the email address from which I have received email from Mrs. Wilkes:

1) APPLICATION FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION;

2) PLAINTIFFS' MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF APPLICATION FOR TRO AND PRELIMINARY INJUNCTION;

2) DECLARATION OF DEBORAH L. RAYMOND IN SUPPORT OF APPLICATION FOR TRO AND PRELIMINARY INJUNCTION;

3) DECLARATION OF LOWELL LABERTEW IN SUPPORT OF APPLICATION FOR TRO AND PRELIMINARY INJUNCTION;

4) DECLARATION OF SANDRA LABERTEW IN SUPPORT OF APPLICATION FOR TRO AND PRELIMINARY INJUNCTION; and

5) A COPY OF THE SUMMONS & COMPLAINT with Errata.

8. On Sunday, November 4, 2007, I placed copies of the above refenced documents into sealed envelopes addressed to:

Rick and Beverlee Wilkes
45 Quirico Drive
Pittsfield, MA 01201
(Via First Class U.S. Mail)

3BC Corporation
c/o Guy Campbell, Agent for Service of Process
27949 Starfall Way
Murietta, CA 92563
(Via Express U.S. Mail)

C&R Financial Inc. and
Raymond Jacob Roszkowicz
34178 Pheasant Run Cir.
Wildomar, CA 92595
(Via Express U.S. Mail)

and left instruction for the sealed envelopes to be affixed with postage thereon fully prepaid for first-class mail or Express Mail (as noted under to each address) and placed for collection and mailing at Solana Beach or Encinitas, California, following ordinary business practices. I am familiar with the business' practice for collection and processing of correspondence for mailing with

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the United States Postal Service pursuant to which practice the correspondence will be deposited with the United States Postal Service within 24 hours in the ordinary course of business.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 4th day of November 2007, at Solana Beach, California.

/s/ Deborah L. Raymond
DEBORAH L. RAYMOND, ESQ.